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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

JANE DOE #2,

Plaintiff,

v.

MARCUS JOHNSON, et al.,

Defendants.

Case No. 2:24-cv-01844 DJC AC

**STIPULATED MOTION AND ORDER
TO EXTEND TIME FOR DEFENDANTS
TO RESPOND TO PLAINTIFF'S
COMPLAINT**

Judge: Honorable Dale A. Drozd
Trial Date: None Set
Action Filed: July 1, 2024

Plaintiff has filed proofs of service indicating that Defendants Macomber, Kent and Hickethier were served with summonses and the Complaint on August 7, 2024. (ECF No. 6) Plaintiff has filed proofs of service indicating that Defendants Montes, Parker and Gonzalez were served with summonses and the Complaint on August 2, 2024. (ECF No. 6.) Based on the dates of service, Defendants Montes, Parker and Gonzalez's responses to the Complaint are currently due August 23, 2024, and Defendants Macomber, Kent and Hickethier's responses are currently due August 28, 2024. Fed. R. Civ. P. 12(a)(1)(A)(i).

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1 Plaintiff Jane Doe #2 and Defendants Macomber, Hickethier, Gonzalez, Parker, Kent and
2 Montes (“Defendants”), by and through their attorneys, stipulate as follows.

3 1. Plaintiff and Defendants agree to extend the date for Defendants’ responses to
4 Plaintiff’s operative complaint to September 27, 2024. Good cause for the extension exists as
5 follows.

6 2. Due to the nature of the allegations, the number of defendants and number of claims,
7 Defendants’ counsel cannot reasonably review, investigate, and prepare appropriate responses to
8 the operative complaint by the current deadlines. Defendants’ counsel requires additional time to
9 review and investigate Plaintiff’s allegations, consult with his clients, and determine and prepare
10 appropriate responses to the operative complaint. The extension will also allow the parties to
11 meet and confer concerning any potential motions to dismiss pursuant to Federal Rule of Civil
12 Procedure 12(b)(1)-(7) and Defendants’ potential opposition to Plaintiff’s pending motion to
13 proceed under a pseudonym, ECF No. 3. Accordingly, the parties request the Court enter their
14 stipulation and extend the time for Defendants Macomber, Hickethier, Gonzalez, Parker, Kent,
15 and Montes to respond to Plaintiff’s Complaint until September 27, 2024.

16 3. In addition, the parties are meeting and conferring on Plaintiff’s motion to proceed
17 under a pseudonym (ECF No. 3.) The parties request that the Court allow objections, if any, or a
18 stipulation on Plaintiff’s motion to be filed by September 27, 2024.

19 4. This stipulation does not apply to Defendant Marcus Johnson.

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1 Dated: August 23, 2024

Respectfully submitted,

2 ROB BONTA
3 Attorney General of California
4 ALICIA A. BOWER
5 Supervising Deputy Attorney General

6 */s/ Arthur B. Mark III*

7 ARTHUR B. MARK III
8 Deputy Attorney General
9 *Attorneys for Defendants*
10 *J. Macomber, R. Hickethier, L. Gonzalez, L.*
11 *Parker A. Kent and R. Montes*

12 */s/ Jenny C. Huang*

13 (as authorized August 23, 2024)
14 Jenny C. Huang
15 *Attorney for Plaintiff, Jane Doe #2*
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ORDER

Good cause appearing, the parties' stipulation is GRANTED.

The time for Defendants Macomber, Hickethier, Gonzalez, Parker, Kent and Montes to respond to Plaintiff's Complaint is extended to and including September 27, 2024.

Any opposition by Defendants to Plaintiff's pending motion to proceed under a pseudonym shall be filed by September 27, 2024.

This order does not apply to Defendant Marcus Johnson.

Dated: August 23, 2024

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE